

WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP

FOUNDED 1888

270 MADISON AVENUE
NEW YORK, NY 10016
212-545-4600

SYMPHONY TOWERS
750 B STREET - SUITE 1820
SAN DIEGO, CA 92101
619-239-4599

THOMAS H. BURT
burt@whafh.com
ALEX J. TRAMONTANO
tramontano@whafh.com

111 WEST JACKSON
SUITE 1700
CHICAGO, IL 60604
312-391-5059

May 23, 2025

VIA ECF

Hon. Paul A. Engelmayer
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 1305
New York, NY 10007

Re: *Brown, et al. v. National Football League, Inc. et al.*,
1:25-cv-01220-PAE (S.D. N.Y.)

**Joint motion to set briefing schedule on defendant's motion
To dismiss the complaint; and [proposed] order**

Dear Hon. Judge Engelmayer:

Pursuant to Federal Rule of Civil Procedure 6(b), and Individual Rules and Practices In Civil Cases ("IRP"), Rule 1.E., Plaintiffs Patrick Brown, and Collin Vincent ("Plaintiffs") and Defendants National Football League, Inc. and NFL Enterprises LLC ("Defendants"), by and through their undersigned counsel, respectfully request this Court set a briefing schedule on Defendant's motion to dismiss the Amended Complaint.

Procedural History

On February 11, 2025, Plaintiffs filed their Complaint against Defendants. Dkt. 1. Between February 27, 2025 and April 10, 2025, Plaintiffs and Defendants met and conferred regarding the Complaint on multiple occasions and Plaintiffs stated their intent to file an Amended Complaint. On April 11, 2025, Plaintiffs filed the Amended Complaint. Dkt. 25

On May 13, 2025, Defendants filed a Motion to Dismiss the Amended Complaint. Dkt. 28. On May 14, 2025, this Court issued an order setting a briefing schedule for the Motion, with Plaintiffs' opposition is due on June 3, 2025 and Defendants' Reply is due on June 17, 2025. Dkt. 32.

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The parties set for the following stipulations consistent with IRP, Rule 1.E.:

(1) The original due dates and dates sought to be extended are:

- Plaintiff's Opposition due date of **June 3, 2025**;
- Defendants Reply due date of **June 17, 2025**;

The date the party now seeks through an extension:

- Plaintiff's Opposition due date will be **June 12, 2025**;
- Defendants' Reply due date will be **July 3, 2025**;

(2) the number of previous requests for adjournment or extensions of time: **0**

(3) whether those previous requests were granted or denied: **N/A**

(4) whether the adversary consents: **Yes**

This request for extension of the deadlines will not affect any other scheduled dates.

Good Cause Supports Granting the Extensions

Counsel for the parties have been diligently working to meet the current deadlines, but request additional time for drafting and preparing the briefing. The requested extension is modest and will not prejudice any party. It is sought jointly, in good faith, and not for the purpose of delay. An extension will ensure that each party has sufficient time to fully respond to the arguments raised in the opposing briefs.

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: /s/ Thomas H. Burt
Thomas H. Burt

Thomas H. Burt
Lillian Grinnell
270 Madison Avenue
New York, New York 10016
Telephone: 212/545-4600
Facsimile: 212/686-0114
burt@whafh.com
grinnell@whafh.com

Attorneys for Plaintiff

DEBEVOISE & PLIMPTON LLP

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By: /s/ Michael Schaper
Michael Schaper

Michael Schaper
(mschaper@debevoise.com)
John Gleeson
(jgleeson@debevoise.com)
J. Robert Abraham
(jrabraham@debevoise.com)
66 Hudson Boulevard New York, New York
10001 Tel: (212) 909-6000

Edward D. Hassi (thassi@debevoise.com)
801 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Tel: (202) 383-8000

*Attorneys for Defendants the National
Football League and NFL Enterprises LLC*

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PROPOSED ORDER

IT IS HEREBY ORDRED, pursuant to the Parties Joint Letter Motion filed on May 23, 2025, the briefing schedule for Defendant's Motion to Dismiss filed at ECF Nos. [28] through [31], shall be as follows:

- Plaintiff's Opposition must be filed on or before **June 12, 2025**; and
- Defendants Reply must be filed on or before **July 3, 2025**.

IT IS SO ORDERED.

DATED: 5/27/2025



HON. PAUL A. ENGELMAYER
UNITED STATES DISTRICT JUDGE